

CITY LIGHT DEPARTMENT
OFFICE OF ENVIRONMENTAL AFFAIRS

TO: _____

DATE: 2/6/80

_____	Pete Henault	_____	Don Yon
_____	Peter Willing	_____	Pam Crocker-Davis
_____	Cheryl Tenney	_____	Pamela Anderson
<u>LOVE</u>	Bill Riley	_____	Jean Stephens
_____	Tim Croll	_____	
_____	Laurie Geissinger	_____	
_____	Linda Dolan	_____	
_____	Mary Savelle	_____	
_____	Jeremy Robertson	_____	Bob Murray
_____	Jim Mangi	_____	Joe Recchi
		_____	L. Joe Miller
		_____	Steve Fletcher

ACTION:

_____ Please Handle
_____ Recommend Action
_____ Review and Comment Verbally
_____ Review and Comment in Writing
_____ Prepare Letter for _____ Signature
_____ Prepare Memo for _____ Signature
_____ Please Brief _____ on This
_____ For Information: _____ Return _____ File
_____ Route _____ Toss
_____ Please See Me Immediately

RETURN OR COMPLETE BY: 1 / 80 A.M.
P.M.

COMMENTS: *Give me your thoughts*
on Joe's comment
See memo of 2/8/80, Henault for Murray,
"PCB Priorities"

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DATE January 29, 1980

TO : Ken Hunich - W. Sickler - T. Rockey - F. Mandapat

FROM : Carole V. Coe

(Sgd.) Carole V. Coe

SUBJECT: PCBs at City Light

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A number of questions were submitted to the Safety Unit as a result of a meeting in late December, 1979 that dealt with how changes in EPA regulations affect City Light's handling and disposal of PCBs. Lee Pehn and Irene Jackson met with Charles Rice and Jim Everts, local EPA staff members, for answers to these questions. They in turn consulted with EPA headquarters in Washington, D.C., hence the delay in response. Unfortunately, the EPA does not currently have answers to all the specific questions which were raised by City Light people so in some cases a judgement factor is an element of the answer.

Is it necessary to handle oil leaks from pole-mounted PCB-contaminated transformers the same way PCB capacitor spills are handled? The answer is a qualified "no". Washington, D.C. EPA headquarters advised the local EPA people that a policy is in the making that addresses this situation but no information is being released on what the policy will be! We have previously been advised by the EPA that pole-mounted transformers already in our system (which are all considered to be PCB-contaminated) may be serviced and maintained in the established manner, except for fluid disposal. The State requires that gloves must be worn and, when there is the possibility of splash, protective covering must be worn to avoid skin-contact or clothing contamination. Where ventilation is good, respirators are not required. If the leak is sizable enough to cause adjacent equipment and ground contamination, it would be advisable to exercise cleanup procedures that are used for capacitor spills, until such time as the EPA issues its policy. Keep in mind that the EPA does restrict disposal of oil from PCB-contaminated transformers (more on that later in this memo).

How can other equipment be kept free from contamination in case of PCB capacitor spills or PCB-contaminated pole-mounted transformer leaks? Swabbing adjacent equipment on the pole and disposing of the rags properly is considered adequate protection by the EPA.

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To reduce public reaction, could protective clothing worn for PCB capacitor cleanup be something other than white? There is no regulation that specifies color of disposable protective clothing. Since the clothing is purchased by Distribution and Operations, division management may want to investigate whether colors that would have less visual impact are available.

How about establishing our own testing program to determine if transformers are non-PCB-contaminated or PCB? The local EPA advised that testing for PCBs is a detailed, precise laboratory procedure. They suggested that their chemist, Arnold Gahler, be consulted for information on these procedures to determine the feasibility of designing a City Light PCB testing facility. Mr. Gahler can be reached at 442-0370.

How do we dispose of oil from PCB-contaminated transformers? EPA representatives Rice and Everts suggested that the most practical way for us is as follows:

1. When a pole-mounted transformer comes into the shop for service and is drained, the oil should go into a labeled storage tank.
2. Each time the tank becomes full, and before disposal can be considered, a sample from the tank should be laboratory analyzed to establish the PCB content. Testing is the only way to determine whether the oil is non-PCB, PCB-contaminated or PCB.
3. Disposal, according to these regulations:

Non-PCB (0-50 ppm PCBs)	Can be sold for salvage but cannot be used as a sealant, coating or dust control agent.
PCB-contaminated (50-499) ppm PCBs)	Must be disposed of in high efficiency boilers, approved chemical waste landfills or in high temperature incinerators.* Transformer cases can be sold for salvage.
PCB (500 or more ppm PCBs)	Disposed of by high temperature incinerators.*

* (See Page 3)

* Currently there are no EPA-approved high temperature incinerators. The first approval is not likely until June, 1980. The APPA has filed an appeal with the EPA requesting revisions of this requirement. For now, we can only assume that our contract with Wes-Con for disposal at the Idaho approved landfill site will continue until required incinerator facilities are available.

The question of how to ultimately purge our system of PCB-contaminated transformers is not addressed at all by the EPA. Local EPA people suggest that permanent, accurate records be kept of all new mineral oil transformers that City Light acquires, along with their location. They theorize that if records can show that these transformers are not brought in for servicing, they will eventually be considered non-PCB by the EPA. Expanding on this theory, Lee and Irene suggest that it might also be advisable to identify and keep records of PCB-contaminated transformers that are drained in the shop and then refilled with mineral oil. The reasoning behind this is that if repeated tests on the storage tank reflect our previous assumption that our pole-mounted transformers are non-PCB, we may eventually be granted EPA approval to identify specific transformers as non-PCB. Admittedly, this is speculation.

Safety staff would be much happier if there were more positive answers from the EPA to respond to the questions you submitted, but they just aren't available. Therefore, some decisions will have to be made by judgements based on information that is available. The EPA booklet entitled, "EPA's Final PCB Ban Rule: Over 100 Questions & Answers to Help You Meet These Requirements", which was distributed at the December meeting is a good source of information.

In an effort to clarify who assumes responsibility for what, the Safety Unit has suggested the following:

Distribution Division
Operations Division

Determine what protective clothing will be worn when handling PCB-contaminated transformers and inform field people.

Investigate availability of other colors for protective clothing used for capacitor spills.

Engineering Division

Determine what kind of testing program City Light will implement.

Hunich - Sickler - Rockey - Mandapat
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Engineering Division
Operations Division
Material Management

Establish and issue procedures for testing transformer oil for PCB content.

Engineering
Distribution
Material Management
Operations

Establish record-keeping system for all new transformers ordered as non-PCB. Make decision as to advisability of record-keeping system for transformers that are drained, refilled with mineral oil and returned to system.

Material Management

Establish separate disposal procedures for transformer

Non-PCB oil
PCB-contaminated oil
PCB oil

(These must be implemented immediately, if not already in effect, to be in compliance with EPA regulations.)

IJ:mgs

cc: Murray
Recchi
Fletcher, S.
Henault-Riley
Coe
Keith
Jerochim
DeVries
Peha
Jackson
File

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